



Reply to
Attn of: HW-117

September 14, 1990

Teri Fisher
Washington Department of Ecology
MS PV-11
Olympia, WA 98504

Dear Teri:

Thank you for forwarding a copy of the Colbert Landfill Community Relations Plan for our review and comment. Both Neil Thompson and I have reviewed this plan and our comments are attached. I have kept the mail list appendix to update our mail list with, so only the plan itself is enclosed.

After you have reviewed our comments, please give me a call to discuss them. I assume we can finalize the CRP by the end of this month. Hope you enjoyed your training.

Sincerely,

A handwritten signature in cursive script that reads "Grechen F. Schmidt".

Grechen F. Schmidt
Community Relations Coordinator

cc: Neil Thompson, EPA
Mike Kuntz, Ecology

enclosure

USEPA SF



1414881

①

Rec'd
9/15/90

C.R.
Public Participation Plan for Remedial Design,
Remedial Action and
Operation & Maintenance
at Colbert Landfill
July 10, 1990

include statement that
this revises earlier
versions

A. Overview of ~~Public Participation Plan~~
CR

This ~~Public Participation Plan~~ identifies community concerns about the Colbert Landfill site, located approximately 2.5 miles north of Colbert, Washington, in Spokane County. This plan discusses community relations efforts to occur during the Remedial Design/Remedial Action (RD/RA) and Operation and Maintenance (O & M) phases of the cleanup. It is an updated revision of this ~~Public Participation Plan~~ developed for the Remedial Investigation and Feasibility Study phases of the Colbert project. Interest in this site has been extensive since 1980, when residents first complained to the Eastern Regional Office of the Department of Ecology and to the Spokane County Utility Department (SCUD), that hazardous materials were being disposed of at the landfill.

define
RD/RA +
O&M

This plan is designed to insure that ^{of work, cleanup} the community is provided with adequate information about progress at the site and is also given opportunity to provide meaningful comment and ask questions at key points in the process. Because the public interest in the site has existed for so long, many of the mechanisms needed to provide the information are already in place. This plan continues those community relation efforts which proved most successful in providing relevant information to the affected community and provides a structure for timing and methods for future activities.

good

This public participation plan has the following sections:

- * Overview
- * ~~The Site~~ Background/History
- * Community Concerns
- * Community Relations History
- * Timing and Distribution Information
- * Signed Agreement Letter by the EPA, Ecology and Spokane County
- * Appendices

(2)

Information on community concerns and community relations methods and timing in this plan are based on interviews conducted by the Environmental Protection Agency (EPA) and the Washington Department of Ecology (Ecology) on July 17 and 24, 1989. Elected county officials and county employees, as well as representative members of the community were interviewed. Spokane County has hired Landau Associates, Inc., of Edmonds Washington, to implement the RD/RA and O & M phases of the cleanup. Ecology and EPA has joint responsibility for overseeing the RD/RA efforts at Colbert.

Do we need to say this here? or anywhere at all?
Not CR

B. The Site Background/History

X The Colbert Landfill is a forty acre site owned by Spokane County. It operated from 1968 through 1986, when it was filled to capacity. The landfill accepted both municipal and commercial waste. It is located in the southeast corner of Section 3, Township 27 north, Range 43 East, WM and is approximately 1.5 miles north of Spokane, Washington and 2.5 miles north of the town of Colbert, Washington. The area surrounding the Colbert landfill is predominantly semi-rural with an estimated population of 1500 people living within a three mile radius. The closest residents are located north and east of the landfill.

In 1980, area residents complained to Ecology's Eastern Regional Office about disposal practices at the site. [Subsequent investigation of groundwater and drinking water wells by State and county officials, under the lead of the county, determined solvents, consisting primarily of 1,1,1-trichloroethane (TCA), trichloroethylene (TCE), tetrachloroethylene (PCE), 1,1-dichloroethylene (DCE), and 1,1-dichloroethane (DA). Sampling confirmed the presence of TCA in some wells, and the site was listed on EPA's National Priorities List (NPL) in August 1983. because of this contamination.]

present in the groundwater. They

The Remedial Investigation/Feasibility Study (RI/FS) was submitted for public review in May 1987. Based on the findings of the RI/FS EPA issued its "Record of Decision" (ROD) in September 1987. The ROD addresses controlling the migration of groundwater contamination by pumping and treating contaminated groundwater from the affected aquifers. Treated groundwater will be discharged into the Little Spokane River. Before the implementation of the EPA-selected remedy, a consent decree and scope of work ~~will be~~ ^{was} negotiated between the regulatory agencies involved (Ecology and EPA) and three of the Potentially Responsible Parties (PRP) (Spokane County, Key Tronic Corporation, and Fairchild Air Force Base). Other PRP's have been identified but, as yet, are not contributing to the cleanup efforts at Colbert.

define RI/FS

outline the plan for

X In the Consent Decree, Spokane County agreed to conduct the RD/RA and O & M in accordance with state and federal Superfund laws (Comprehensive Environmental Response Compensation and Liability Act [CERCLA] as amended by the Superfund Amendments and Reauthorization Act of 1986 [SARA] and the State Hazardous Waste Cleanup Act [70.105B RCW]). This decree was signed in U. S. District court on February 28, 1989, and cleared the way for remedial activity to begin as described in the Scope of Work.

contained in the decree

define

check order (parallel)

add info to RI/FS - only time appears to be void without it

attach for correct description

September 13, 1990 nt

Colbert Landfill CRP

Comments on the Colbert RD/RA Community Relations Plan.

1. Subsequent investigation of local drinking water sources by Spokane County and Ecology identified that residential wells were contaminated with 1,1,1-trichloroethane (TCA). Further studies documented that TCA and other chlorinated organic solvents were in the groundwater and were contaminating residential wells. This contamination was the basis of listing the Colbert Landfill on the EPA National Priorities List (NPL) in October 1983.

C. Community Concerns

On July 17 and 24, 1989, EPA and Ecology representatives conducted interviews with members of the Colbert community as well as elected county officials and county employees. The following is a summary of the concerns expressed by those interviewed.

- * Property Values: This was a common theme from those living near the landfill. Opinions varied as to whether the loss of property value in the area was perceived or real. One interviewee noted that a neighbor had recently sold property at \$20,000 below the assessed value and suggested that the "stigma" placed on the area was the reason for the lower price. Blame for this "stigma" was placed mostly on negative media attention. One official noted that the Colbert area is ripe for development and property values have not really dropped as a result of the Colbert situation.
- * Effects on Little Spokane River: Remedial plans include discharge of treated groundwater into the Little Spokane River. Concern was expressed that this additional water will increase erosion and flooding problems for river-front property owners. Concerns were also raised that the treated water will pollute the river with contaminants which cannot be removed by the planned air stripping process.
- * Air Pollution: Some people interviewed expressed concerns that the method of removing contaminants from groundwater (i.e., air stripping) will cause air pollution problems because the contaminants will be volatilized and discharged into the atmosphere. Those raising this concern also expressed strong sentiment that the groundwater contaminant plume must be controlled. Many also raised concerns that the stripping towers may add to an already bad fog and black ice problem along the roadways in winter because of the vapor discharge.
- * Impacts on Property: Because the affected area is so large, many of the remedial facilities will need to be placed on private property. Concerns about location and aesthetics of these facilities and right-of-way issues was common.
- * Well Drawdown: The remedial measures are expected to pump approximately 200 gallons of water per minute (GPM) from the shallow aquifer and approximately 1600 gpm from the deep aquifer. Concerns were raised about water draw down in privately owned wells, both in and out of the contaminated area, due to the large volume of water being pumped. One interviewee raised the question of water rights and how the remedial measures to be taken might affect them.

- * Private Well monitoring Program: Almost everybody interviewed said that the private well monitoring program, in place since 1987, should continue.
- * Pace of Cleanup Process: Many expressed concerns over the slow rate of cleanup to date. While progress has been made, the cleanup has been very time consuming.
- * Information: This concerned everyone interviewed for one of many reasons. A need for more trust between the county government and the citizenry was expressed and Information was suggested as the key. Many felt that the media needed to be brought into the information flow and should be encouraged to report some of the good things happening in the area. Some suggested this might help alleviate the "stigma" many blame the press for creating. A call was made for clear, concise, and accurate information. Priority methods for dissemination of information varied but all felt newsletters (fact sheets) were effective. Many said the Colbert Cleanup Committee (CCC) meetings had been constructive in verbal exchange of views. This committee was made up of representatives of Colbert area citizens, Key Tronic Corporation, Spokane County, Ecology, a county "citizen-at-large", and a facilitator. Opinions on the need to continue the CCC meetings varied as did the views on the frequency of newsletters and public information meetings.

better info exchange or something like this would make this cleaner

is this the same as CCC? I think they are different

D. Community Relations History

Community concerns about groundwater contamination at Colbert Landfill has been high since 1980, when local residents complained to Ecology and the County that hazardous materials were being disposed of at the landfill. At that time, Spokane County hired a consultant to study the extent of the contamination. The county also began a community relations program that included a public information effort to explain the study to local residents. The county distributed fact sheets and press releases about the Colbert situation, notified well owners of their test results, and established an information repository at the Colbert Water District building.

The county also held seven public meetings between May 1981 and November 1983, explaining each phase of the study and test results. Representatives from several agencies, including Spokane County Health District and the County Tax Assessor's Office were available to respond to questions. Citizens expressed numerous significant concerns at these meetings. The primary concern was whether or not the well water was safe for drinking or other purposes, and what the potential health impacts could be from drinking the water. Residents were also concerned about how the contamination would affect their property values.

There were three official responses to the concerns mentioned above. In March 1983, Spokane County and Key Tronic Corporation began supplying bottled water to those homes where wells had over 1,000 parts per billion (ppb) of 1,1,1-trichloroethane (TCA). Shortly afterward, the

X Spokane County Tax Assessor reduced the assessed valuation of homes with wells at or above this contamination level and of the homes within 3/4 mile of the landfill. In response to continued public requests for safe drinking water supplies, the County and Key Tronic paid for the extension of the Whitworth Water District lines into the contaminated area. Because regulatory levels for TCA contamination had dropped from 1000 ppb to 200 ppb, domestic wells exceeding 200 ppb of contamination were connected to the waterline extension.

In the fall of 1985, local residents, not satisfied with County response to their requests, formed the Colbert Landfill Contaminant Area Committee. The group's purpose was to collect information and make it available to interested people. In December 1985, this group presented seven recommendations to the Spokane County Commissioners. The major requests were: free water hookups for all homes in the contaminated area, with no water payments for twenty years; revaluation of property in the area; and continued well monitoring for twenty years. The County's response continued the policy of hooking up only those homes which exceeded specific contaminated levels. The citizens saw this as too restrictive, which increased their frustration.

CLAC-?
Colbert
Landfill
Cleanup
Action
Committee

X ^{*EPA} Ecology met frequently with concerned citizens and County and Key Tronic representatives between 1985 and 1987. Ecology held a public meeting in 1986 to explain the Remedial Investigation/Feasibility Study (RI/FS) process and to discuss the results of the RI. Ecology distributed a fact sheet, in April 1987 which discussed the numerous cleanup options presented in the Feasibility Study. This fact sheet also announced the public comment period and a public meeting scheduled for May 1987. The main purpose of this meeting was to explain the cleanup alternatives and the options for treating the contaminated water, and to accept public comment. Over 200 people, primarily local residents, attended. The citizen's major concerns regarding the FS were the shortness of the comment period (which was then extended), the concentration on the County, Fairchild Air Force Base, and Key Tronic without searching for other potentially responsible parties, potential air pollution from the air stripping, and groundwater level drawdown caused by the extraction system.

and
EPA

In August 1987, Ecology distributed a notice of a public meeting to take place in September at the Bishop Topal Center in Colbert. Two sessions were held for citizen convenience and the meeting was to discuss the comments and concerns brought up at the public meeting held in May and during the FS comment period. Also in August 1987, an update was distributed by Ecology which summarized comments received during the FS comment period.

Move
purpose
into
1st sentence
for
Clarity

X In January 1989, a consent decree for RD/RA and O&M phases of the Colbert cleanup was signed. Parties to this decree were EPA, represented by the U.S. Department of Justice, Ecology, Spokane County, and Key Tronic Corporation. Ecology produced and distributed a fact sheet announcing a public meeting and comment period for the decree. This fact sheet also provided a basic summary of the potential impact and results of the consent decree. The public meeting announced in the fact sheet occurred in early February 1989 at the Colbert Elementary

and EPA

called
a proposed
plan

School. Ecology and EPA explained the consent decree and took public comments. ~~These comments were forwarded to the U.S. District Court Judge in Spokane as part of the Consent decree package~~
In May 1989, a public meeting was held at the Colbert School to introduce Landau Associates, Inc. to the Colbert community. This firm was hired by the County to complete the RD/RA and O & M phase of the cleanup process. Members of the Landau team were present to answer questions, as were County, Ecology, and EPA officials.

In July 1989, interviews were conducted by Ecology and EPA to be used in updating the Community Relations Plan for Colbert for the RD/RA and O&M. The plan was finalized in September 1989 and provides guidance for community relations efforts through these phase.

On August 21, 1990 a public meeting was held at the Lakeside Recovery Center in Colbert. The purpose of the meeting was to provide Landau Associates, Inc., an opportunity to discuss the pilot pump and treat system with the community and to answer any questions they may have.

In September 1990, the ~~Public Participation Plan~~ ^{CRP} was revised to incorporate community concerns.

E. Techniques and Timing

The following activities will be undertaken by ~~Spokane County and/or their consultants~~, Ecology and EPA during the Remedial Design (RD), Remedial Action (RA) and Operation and Maintenance (O & M) phases of the Colbert Project. The following describes the minimum ~~effort necessary~~. ~~If Ecology or EPA chooses to do more, Spokane County will be notified of the activity. If Spokane County chooses, they may do more, but only with Ecology and EPA oversight.~~

requirements under state and federal law.

effective public involvement process requires active participation by EPA, Ecology or Spokane County and continued communication with the affected citizens.

Preparation and Distribution of Fact Sheets: regular
Informational fact sheets will be produced on a bi-monthly basis during the RD/RA phases of the cleanup, then on an as needed basis during the O&M phase. Fact sheets will be used to update the public about mobilization activities, design milestones and any other information deemed pertinent by Spokane County, Ecology or EPA. Fact sheets will be used as a tool to answer questions and concerns raised by citizens either in writing, by phone or by being asked at the citizen group meetings, as appropriate. The Fact Sheets will also include a "Citizen Corner" to announce their meetings or make other announcements. Fact Sheets will be used to notify the public in the event of activities or findings which were not anticipated or which, if not explained, could be alarming to the public. Fact sheets will be provided to those on the Colbert Landfill mail list and any other individual, firm, or agency requesting them.

citizen community meetings

- * Update of Mail List: The Colbert Landfill mail list will be updated on an ~~annual~~ ^{regularly} basis through use of fact sheets and/or any other method deemed appropriate by Ecology or EPA. ~~This annual update does not preclude individuals, firms, or~~

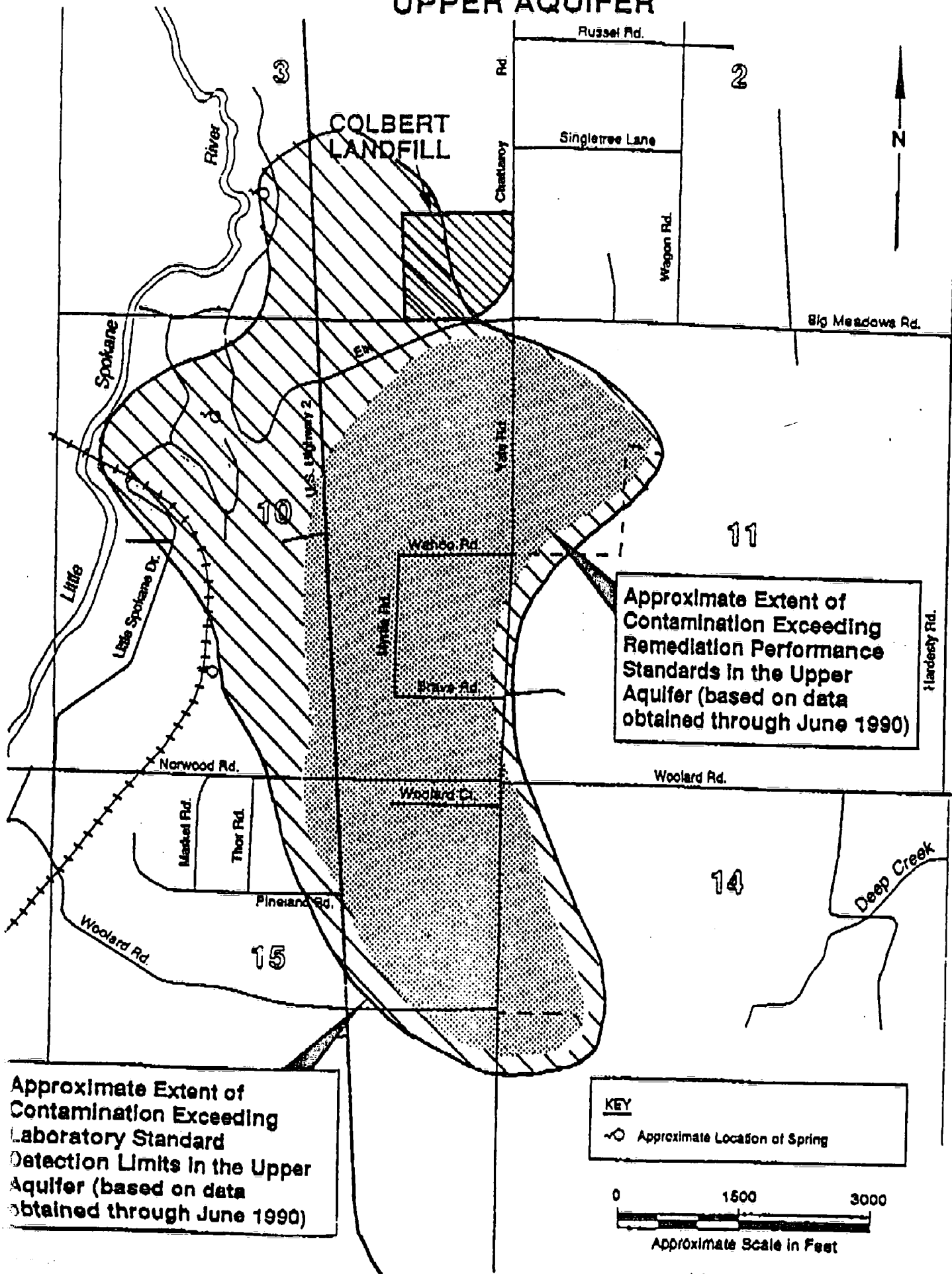
agencies from being placed or removed from this list at any time by written or phoned request to Ecology, EPA or Spokane County, rather it provides formal opportunity for placement on, and reminder of the availability of this mail list.

- * Public Involvement and Input: Opportunity will be provided for comment on, and provide input into the aesthetic qualities of the permanent extraction, treatment and discharge structures. The interest shown in the past by area residents should be tapped to gather input on landscaping, color or any other aspect the public views as important. Input can initially be from small advisory groups, but the design process can have meaningful impact on the aesthetic issues until a public meeting is held to present and accept ideas on the final appearance of the system. Because more specifics will be known at this time, the community should also be brought to to date on locations of permanent facilities, progress and problems. as well as provided opportunity to ask questions. During these phases (RD, RA, or O&M) ~~if interest appears significant enough to Ecology, EPA or Spokane County,~~ informal public meetings will be held to provide the public more opportunity to ask questions and/or be updated on the progress. Ecology and EPA will make the final determination on this issue and will host the meetings if necessary.

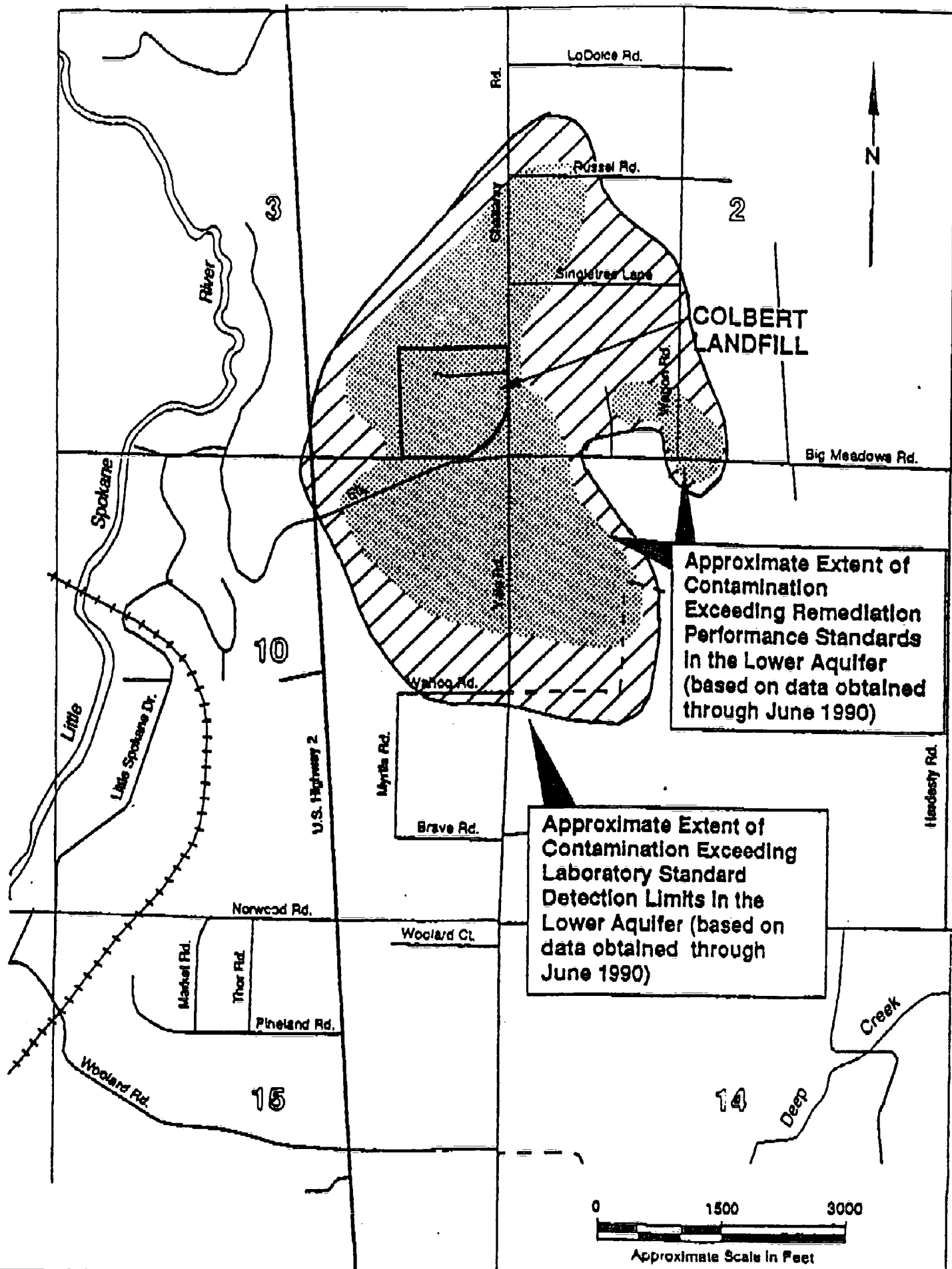
- * Information Repositories: Information repositories will be updated by Spokane County as needed, but no less frequently than semi-annually. A list of materials placed in the repositories will be provided to Ecology and EPA. Technical information, reports, fact sheets, and any other information Spokane County, Ecology or EPA determine is relevant should be placed in them.

- * Site Tours: During the RA/RD phase of the project site tours and visual displays will be made available if requested by the community. Requests should be made to Spokane County, Ecology and EPA. Requests for site tours should be consolidated and scheduled for a time convenient to the community. Site tours may be scheduled by Spokane County, Ecology and EPA and advertised through a fact sheet.

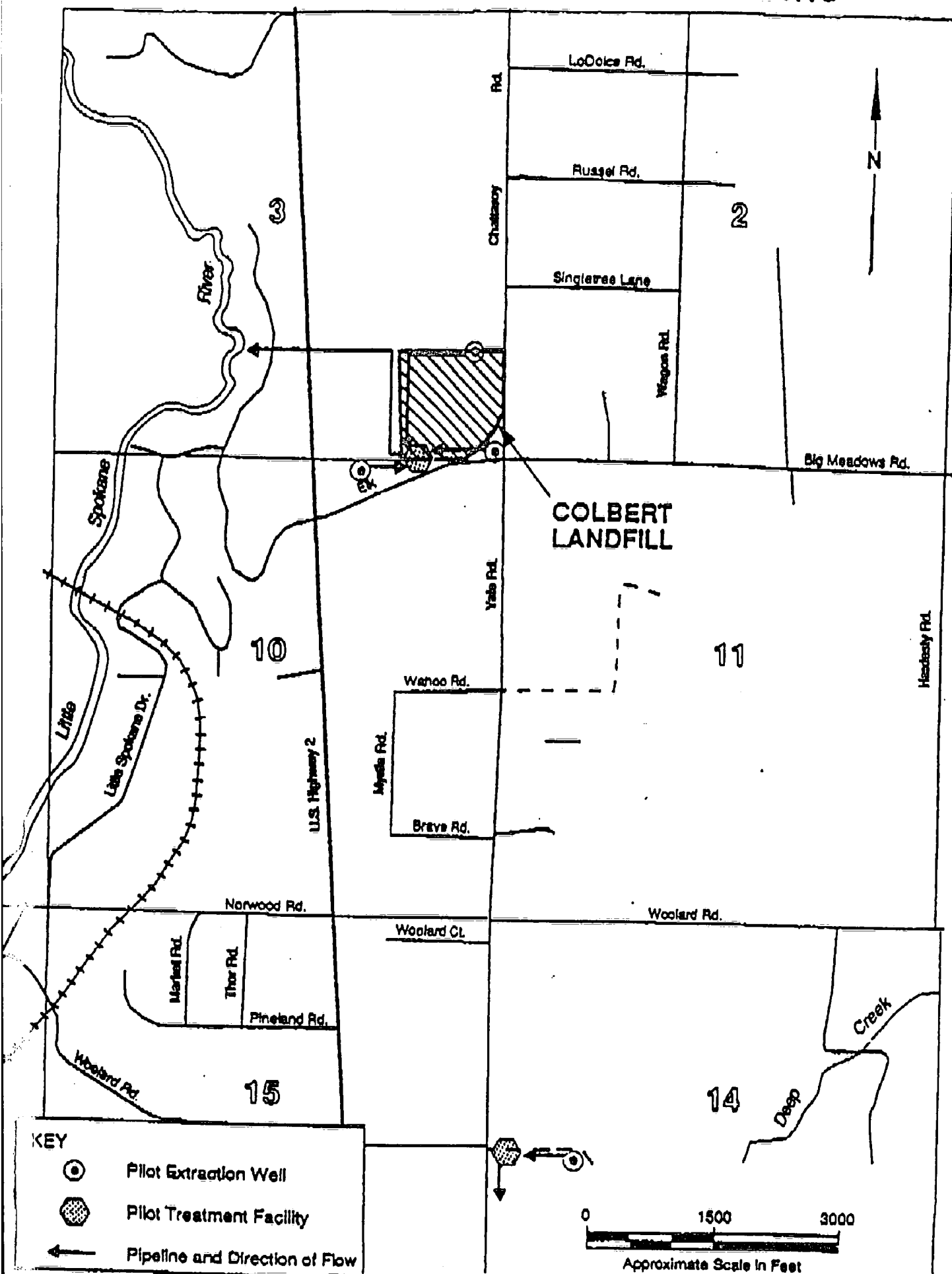
EXTENT OF CONTAMINATION UPPER AQUIFER



EXTENT OF CONTAMINATION LOWER AQUIFER



PHASE I PILOT STUDY SYSTEM SCHEMATIC



TREATMENT SYSTEM SCHEMATIC

